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Briefing on Options for Retrofit Requirement

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- Std
- MS4 expansio
- Retrofit

Permitting Authorities with Retrofit Requirements

Questionnaire Responses		Jurisdiction	Who Applies To	Requirement
MS4 General Permit	Count	UT	Small MS4 General Permittees, soon Phase I Permittees too	Plan to address sites impacting WQ. Prioritize based on WQ impacts, opportunistically.
		WI	MS4 General and Individual Permits	40% reduction in TSS from existing discharges by 2013. Many must retrofit.
MS4 Individual Permits	11 (22%)	NY	54 MS4s to meet numeric load reductions (N, P, Pathogens). East of Hudson requires approval of retrofit plan to meet P targets.	Identify problem sites. Prioritize projects for pollutant reduction, proven technology, economic feasibility.
Where TMDLs necessitate	3 (6%)	TN	Small MS4s with TMDLs	Inventory potential locations based on flooding and WQ impacts. Prioritize based on cost, WQ benefits, acceptance, and aesthetics. Must emphasize infiltration, evapotranspiration, and
In separate regs	5 (10%)	CO	Phase 1 individual permits,	Assess impacts of flood management projects. Retrofitting required in some cases.
No	25 (50%)	Montgomery County	Phase I Permittees	Determine water conditions, specify and prioritize nonstructural and structural practices, monitor and document progress until all land covered by specific action plan. Additional 20% of land area must be restored by end of permit term

BASELINE: Regulated MS4 ICR

Table A-64. Purpose of stormwater retrofit program

Response	Phase I		Phase II		All	
	Yes	%	Yes	%	Yes	%
To comply with stormwater permit requirements	63	26%	21	9%	84	18%
As a demonstration site or training opportunity	36	15%	10	4%	46	10%
To comply with CSO long term control plan	7	3%	3	1%	10	2%
To address flooding	56	23%	28	12%	84	18%
To address wetlands mitigation	24	10%	5	2%	29	6%
To comply with Total Maximum Daily Load (TMDL) or other Clean Water Act water quality requirement(s)	49	20%	17	7%	66	14%
To comply with Safe Drinking Water Act (SDWA) wellhead protection or UIC regulations	10	4%	3	1%	13	3%
To comply with other federal regulations (ESA, CERCLA, WRDA, etc.)	12	5%	3	1%	15	3%
Other requirements, such as state requirements	9	4%	4	2%	13	3%
To address watershed plan or local water quality, habitat or stream stability or geomorphology concerns	56	23%	22	10%	78	17%
Other	16	7%	2	1%	18	4%
Not applicable	14	6%	20	9%	34	7%